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Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 04-0257DAE-02
)	
Plaintiff,)	MOTION FOR DEPARTURE DOWNWARD
)	IN SENTENCING DEFENDANT
VS.)	SANCHEZ
)	
CHRISTIAN JASON MAXWELL, (01))	
PATRICIO SANCHEZ, III, (02))	
LEILA LAGAFUAINA, (03))	
)	Sentencing Date: 5/25/06 at
Defendants.)	2:15 p.m., before Chief U.S.
)	District Judge David A. Ezra

MOTION FOR DOWNWARD DEPARTURE
IN SENTENCING DEFENDANT SANCHEZ

The United States of America, by and through its undersigned counsel, hereby moves this Honorable Court to depart downwards in imposing sentence upon defendant Patricio Sanchez, III, due to his substantial assistance to and cooperation with law enforcement authorities in the investigation or prosecution of other persons who have committed an offense.

This motion is made pursuant to 18 U.S.C. 3553(e) and U.S. Sentencing Commission Guideline 5K1.1, and is based upon the information contained in the sealed "Factual Basis for Motion for Departure Downward in Sentencing Defendant", filed concurrently herewith.

DATED: Honolulu, Hawaii, May 18, 2006.

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

By /s/ Michael K. Kawahara
MICHAEL K. KAWAHARA
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that, on the dates and by the methods of service noted below, a true and correct copy of the foregoing was served on the following at their last known addresses:

Served Electronically through CM/ECF:

Pamela Byrne pamela_byrne@fd.org May 18, 2006

Attorney for Defendant
Patricio Sanchez, III

Served by hand-delivery:

Probation Officer May 18, 2006
300 Ala Moana Blvd.,
Box 50111, Rm. C-126
Honolulu, HI 96850

/s/ Rowena N. Kang